UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

July 14, 2016

Mr. Bruce Campbell
Sr. Manager, Environmental Compliance
American Airlines, Inc.
4333 Amon Carter Blvd MD 5285
Fort Worth, Texas 76155

Mr. Robert Freeman
Environmental Manager II
Los Angeles World Airports
7301 World Way West
Los Angeles, California 90045

Re: EPA Conditional Approval of the Management of PCBs at the Electrical Substation at Hangar 3, Phase 2 Work Plan – Concrete Pad Removal and Confirmation Soil Sampling, American Airlines Los Angeles International Airport

Dear Mr. Campbell and Mr. Freeman:

Thank you for your submission of the *Management of PCBs at the Electrical Substation at Hangar 3, Phase 2 Work Plan – Concrete Pad Removal and Confirmation Soil Sampling,* prepared by Arcadis U.S., Inc. (Arcadis) on behalf of American Airlines, Inc. (AA), received on June 21, 2016 (Application). The Application proposes removal of a polychlorinated biphenyl (PCB)-impacted concrete pad, and soil confirmation sampling at the electrical substation at Hangar 3 at the Los Angeles International Airport (Site). The U.S. Environmental Protection Agency (EPA) is issuing this risk-based approval (Approval) under the Toxic Substance Control Act (TSCA) pursuant to 40 C.F.R. § 761.61(c).

The EPA understands that the Los Angeles World Airports (LAWA) owns and operates the LAX and leases Hangar 3 and the associated electrical substation to AA. EPA is issuing this Approval to both the property owner and the responsible party, LAWA and AA, respectively. This Approval covers PCB-impacted areas within the electrical substation at the Site.

PCB remediation effort at the Site are being conducted using a two phase approach. Phase I has been completed and involved encapsulation of the PCB-impacted concrete pad with an epoxy sealant where the former PCB transformer was located. The Phase I activities were approved by EPA in a letter dated December 10, 2014. The sealant was inspected on a monthly basis for wearing away of the epoxy coat. AA also conducted wipe samples every six months following application of the sealant in the areas where the highest PCB concentration was detected in the concrete. Certification of the inspection was provided to EPA on an annual basis. Phase 2 includes removal and proper disposal of the concrete pad; and collection of verification samples to confirm adequate removal of PCB contamination in the underlying surface that will remain in-place.

EPA has reviewed AA's Application, and has prepared this Approval with conditions. AA is subject to the following conditions pursuant to 40 C.F.R. § 761.61(c), and shall incorporate the stipulations of these conditions when implementing the activities proposed in the Application:

1. **Remove Stained Soil.** Following removal of the concrete pad, excavate any visually impacted soil at the concrete/soil interface, to help ensure removal of PCB-impacted areas.
2. **Laboratory Analysis.** Samples shall be analyzed for PCBs using EPA Method 8082. The use of extraction method 3540C (soxhlet extraction) is preferred.
3. **Sidewall Sampling.** Collect surface sidewall samples along the perimeter of the excavation. These sidewall samples will be used to confirm removal of PCBs along the perimeter of the removed pad. EPA suggests collection of at least 3 additional grab sidewall confirmation samples (1 sample along the north side, 1 sample along the east, and 1 sample along the south side of the excavation).
4. **Sample Outside of the Excavation.** Collect one surface soil sample outside of the excavation to evaluate potential impacts from surface water run-off from the concrete pad. EPA suggests collection of this soil sample on the south part of the Site between the excavation and the cinder block wall. Remove any rocks or grass in that area and collect a soil sample at 0-3 inches below ground surface.
5. **PCB Cleanup Criteria.** There are two sets of PCB regional screening levels (RSLs); one for restricted use (industrial), and one for unrestricted use (residential). If AA would like to use a cleanup goal that corresponds with restricted use (industrial RSL), AA shall work with the landowner to incorporate land use controls (LUCs) associated with that portion of the property, subject to EPA approval. On the other hand, if AA would like to use a cleanup goal that corresponds with unrestricted use, such as the residential RSL, AA will not be required to maintain a LUC at the Site. AA shall evaluate the cleanup goal options described above, discuss with LAWA as necessary, and then provide EPA with the final decision.
6. **Schedule.** AA shall follow the schedule provided in Section 5 of the Application, and any changes to the schedule must be requested in writing to EPA for approval, at least one week prior to the changes being implemented.

After removal activities and soil verification sampling activities have been completed at the Hangar 3 electrical substation, EPA will review the analytical data to determine if additional characterization and/or remediation activities are warranted. EPA will notify AA of any additional approval applications that AA must submit to EPA pursuant to 40 C.F.R. § 761.61(c).

This Approval does not relieve the Parties and their consultants from complying with other applicable TSCA PCB and Federal regulations, or state and local regulations and permits. Departure from this Approval without prior written permission from EPA may result in revocation of this Approval. Nothing in this approval bars EPA from imposing penalties for violations of this Approval or for violations of other applicable TSCA PCB requirements or for activities not covered under this Approval.

This Approval only applies to the site that is the subject of this Approval. EPA reserves the right to require additional characterization and/or cleanup of PCBs at the Site if new information shows that PCBs remain at the Site above the EPA-approved PCB cleanup levels, or if PCBs are found at other areas of the Site or immediately adjacent to the Site.

We look forward to assisting you during implementation of the approved Application as modified by this Approval. If you have any questions concerning this Approval, please contact Cynthia Ruelas at (415) 972-3329. Thank you for your cooperation.

Sincerely,

for Jeff Scott, Director
Land Division

Electronic cc: David Hung, Los Angeles Regional Water Quality Control Board
John Haney, American Airlines